

EXHIBIT

A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.: 506969/2022

-----X
DENNIS HOLM,

SUMMONS

Plaintiff designates KINGS
County as the place of trial.

-against-

EDISON VERLY and JB HUNT TRANSPORT INC.,

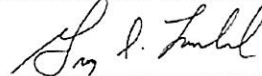
The basis of venue is:
Location of Occurrence

Plaintiff resides at:
73 Upton Street
Staten Island, NY 10304
County of Richmond

-----X
You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the service of this summons exclusive of the day of service where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint

DATED: Brooklyn, New York
March 8, 2022

GEORGAKLIS & MALLAS, PLLC



Gregory S. Lombardi, Esq.
Attorneys for Plaintiff
Office and P.O. Address
9118 Fifth Avenue
Brooklyn, NY 11209

TO: JB HUNT TRANSPORT, INC.
Via Secretary of State
PO Box 130
615 J.B. Hunt Corporate Drive
Lowell, AR 72745

EDISON VERLY
243 Zachary Court
Lakewood, NJ 08701

FILED WITH THE CLERK OF THE COURT ON March 9, 2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
DENNIS HOLM,

Plaintiff,

COMPLAINT

-against-

Index No.: 506969/2022

EDISON VERLY AND JB HUNT TRANSPORT INC.,

Defendants.

-----X

Plaintiff, by his attorneys, GEORGAKLIS & MALLAS PLLC, complaining of the defendants, at all times hereinafter mentioned, upon information and belief, allege as follows:

AS AND FOR A FIRST CAUSE OF ACTION

1. On April 1, 2019, defendant, JB HUNT TRANSPORT, INC., owned a certain 2017 International Box Truck bearing New York State license plate number 2719711.
2. On April 1, 2019, defendant, JB HUNT TRANSPORT, INC., leased the aforementioned truck.
3. On April 1, 2019, defendant, JB HUNT TRANSPORT, INC., maintained the aforementioned truck.
4. On April 1, 2019, defendant, JB HUNT TRANSPORT, INC., controlled the aforementioned truck.
5. On April 1, 2019, defendant, JB HUNT TRANSPORT, INC., repaired the aforementioned truck.
6. On April 1, 2019, defendant, EDISON VERLY, was employed by defendant, JB HUNT TRANSPORT, INC.

7. On April 1, 2019, defendant, EDISON VERLY, operated the aforementioned truck.

8. On April 1, 2019, defendant, EDISON VERLY, operated the aforementioned truck with the permission and consent of defendant, JB HUNT TRANSPORT, INC.

9. On April 1, 2019, defendant, EDISON VERLY, operated the aforementioned truck while in the course of his employment with the defendant, JB HUNT TRANSPORT, INC.

10. On April 1, 2019, defendant, EDISON VERLY, maintained the aforementioned truck.

11. On April 1, 2019, defendant, EDISON VERLY, controlled the aforementioned truck.

12. On April 1, 2019, defendant, EDISON VERLY, repaired the aforementioned truck.

13. On April 1, 2019, plaintiff, DENNIS HOLM, was operating a 2009 Toyota motor vehicle bearing New York license plate number JAK3048.

14. On April 1, 2019, I-278 Southbound Gowanus Expressway in the County of Kings, City and State of New York was a public thoroughfare.

15. On April 1, 2019, at approximately 05:32 PM, defendant, EDISON VERLY, was operating the aforementioned 2017 International Box Truck at the aforesaid location.

16. On April 1, 2019, at approximately 05:32 PM, plaintiff, DENNIS HOLM, was operating the aforementioned 2009 Toyota motor vehicle at or about the aforesaid location.

17. On April 1, 2019, the motor vehicle owned by defendant, JB HUNT TRANSPORT, INC., and operated by defendant, EDISON VERLY, came into contact with the motor vehicle operated by plaintiff, DENNIS HOLM.

18. The aforementioned contact was caused by reason of the negligence, carelessness and recklessness of the defendants in their ownership, operation, maintenance, management, repair and control of the aforesaid 2017 International Box Truck.

19. That defendants were negligent and indulged in culpable conduct by reason of the recklessness and carelessness in the ownership, operation, maintenance, management and control of their aforesaid motor vehicles; in failing to properly maintain, repair and care for the aforesaid motor vehicle; in failing to have same under reasonable and proper control; in failing to keep a proper lookout upon a highway; in failing to give due and proper warning of the movements of said motor vehicle; in failing to heed traffic controls; in failing to signal or give signals; in failing to afford the plaintiff a reasonable opportunity to reach a place of safety; in operating the motor vehicle as to cause the same to come into contact with such objects and/or such persons as involved in said accident; in so operating the motor vehicle as to cause the same to be in such a position on the roadway as to endanger the safety to others; in failing to see; in failing to see that which was there to be seen; in operating said motor vehicle at such speeds at said location as to cause the same to be of danger to others, and in violating the statutes, ordinances and regulations, of which the Court will take Judicial notice, in such cases made and provided.

20. By reason of the foregoing, plaintiff, DENNIS HOLM, was injured.

21. By reason of the foregoing, plaintiff, DENNIS HOLM, was seriously injured.

22. The exemptions set forth in CPLR §1601 do not apply by reason of one or more of the exemptions set forth in CPLR §1602.

23. The exemptions set forth in CPLR §1601 do not apply by reason of one or more of the exemptions set forth in CPLR §1602 including but not limited to §1602(6).

24. By reason of the foregoing, plaintiff, DENNIS HOLM, sustained a serious injury as defined in §5102(d) of the Insurance Law of the State of New York and/or economic losses defined by §5102(a) of the Insurance Law of the State of New York.

25. By reason of the foregoing, plaintiff, DENNIS HOLM, has sustained damages, both general and special, in an amount that exceeds the jurisdictional limits of all lower Courts to be decided by a jury at the time of trial.

WHEREFORE, plaintiff, DENNIS HOLM, demands judgment against the defendants in this cause of action in an amount that exceeds the jurisdictional limits of all lower Courts to be decided by a jury at the time of trial together with the costs and disbursements of this action.

Dated: Brooklyn, New York
March 8, 2022

GEORGAKLIS & MALLAS, PLLC



By: Gregory S. Lombardi, Esq.
Attorneys for Plaintiff
9118 Fifth Avenue
Brooklyn, New York 11209
(718) 238-2400

VERIFICATION

Gregory S. Lombardi, an attorney duly admitted to practice in the State of New York affirms the following under penalties of perjury:

I am an associate of Georgaklis & Mallas, PLLC, attorneys for the plaintiff in the captioned action. I have read the foregoing and know the contents thereof. Upon information and belief, I believe the matters alleged therein to be true.

The reason this Verification is made by me and not by plaintiff is that the plaintiff resides in a county other than the one in which the plaintiff's attorneys' maintain their offices.

The source of my information and the grounds for my beliefs are communications, papers, reports and investigations contained in the litigation file.

Dated: Brooklyn, New York
March 8, 2022



GREGORY S. LOMBARDI



NYSCEF Confirmation Notice

Kings County Supreme Court

The NYSCEF website has received an electronic filing on 03/09/2022 01:25 PM. Please keep this notice as a confirmation of this filing.

Index Number NOT assigned
DENNIS HOLM v. EDISON VERLY et al
Assigned Judge: None Recorded

Documents Received on 03/09/2022 01:25 PM

Doc #	Document Type
1	SUMMONS
2	COMPLAINT

Filing User

Kostantinos Mallas | gmlawefile@gmail.com | (718) 238-2400
9118 Fifth Avenue, Brooklyn, NY 11209

E-mail Notifications

An email regarding this filing has been sent to the following on 03/09/2022 01:25 PM:

KOSTANTINOS MALLAS - gmlawefile@gmail.com

Email Notifications NOT Sent

Role	Party	Attorney
Respondent	EDISON VERLY	No consent on record.
Respondent	JB HUNT TRANSPORT, INC.	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

Hon. Nancy T. Sunshine, Kings County Clerk and Clerk of the Supreme Court - kcco-efile@nycourts.gov
Phone: Phone: 347-404-9766 or 347-404-9762 Website: <https://www.nycourts.gov/courts/2jd/kingsclerk/index.shtml>

NYSCEF Resource Center, nyscef@nycourts.gov
Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

Kings County Supreme Court

Index Number NOT assigned
DENNIS HOLM v. EDISON VERLY et al
Assigned Judge: None Recorded

Hon. Nancy T. Sunshine, Kings County Clerk and Clerk of the Supreme Court - kcco-efile@nycourts.gov
Phone: Phone: 347-404-9766 or 347-404-9762 Website: <https://www.nycourts.gov/courts/2jd/kingsclerk/index.shtml>

NYSCEF Resource Center, nyscef@nycourts.gov
Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Payment Receipt

Kings County Supreme Court

The NYSCEF website has received your electronic filing. Please keep a copy for your records.

Index Number NOT assigned

DENNIS HOLM v. EDISON VERLY et al

Documents Received on 03/09/2022 01:25 PM

Doc #	Document Type	Control #	Motion #	Fee
1	SUMMONS			\$0.00
2	COMPLAINT			\$0.00
			<i>Index Fee</i>	+ \$210.00
			<i>Credit Card Service Fee:*</i>	+ \$6.28
			Total Fee	\$216.28

Payment Information

Generated Receipt #: 0003081915
 Payment Type: **AMERICAN EXPRESS**
 Date Paid: **03/09/2022**
 Filing Fee: **\$210.00 (Authorization Code: 233116)**
 Credit Card Service Fee:* **\$6.28 (Authorization Code: 299556)**

Filing User

Kostantinos Mallas | gmlawefile@gmail.com | (718) 238-2400
 9118 Fifth Avenue, Brooklyn, NY 11209

* **Credit Card Service Fee:** This fee is in addition to the amount paid to the biller and will appear as a separate charge on your credit or debit card statement. This service fee is non-refundable.

Hon. Nancy T. Sunshine, Kings County Clerk and Clerk of the Supreme Court - kcco-efile@nycourts.gov

Phone: 347-404-9766 or 347-404-9762 Website: <https://www.nycourts.gov/courts/2jd/kingsclerk/index.shtml>

NYSCEF Resource Center - nyscef@nycourts.gov

Phone: (646) 386-3033 **Fax:** (212) 401-9146 **Website:** www.nycourts.gov/efile

DOS-1248 (02/12)

DEPARTMENT OF STATE
DIVISION OF CORPORATIONS,
STATE RECORDS AND UCC
99 WASHINGTON AVENUE
ALBANY, NY 12231-0001

CCI-E-CLAIMS



USPS CERTIFIED MAIL



9214 8969 0059 7932 2226 92

202206090404
J. B. HUNT TRANSPORT, INC.
PO BOX 130
615 J.B. HUNT CORPORATE DR
LOWELL AR 72745, USA

001391831 JUN 14 2022